



**UNITED
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PRATT & WHITNEY**

NAME: Pratt & Whitney Aircraft

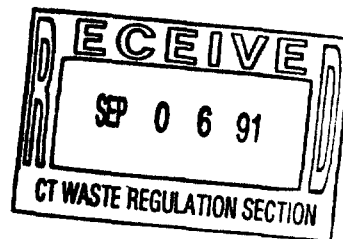
I.D. NO.: CTD 990 612 081

FILE LOC: P-3

OTHER: RDMS #2300

400 Main Street
East Hartford, Connecticut 06108

September 5, 1991



Ms. Lynn M. Clune
Engineer
Waste Engineering and Enforcement Division
Department of Environmental Protection
165 Capitol Avenue
Hartford, CT 06106

REF: RCRA Part B Application for Pratt & Whitney East Hartford CTD990672081

Dear Ms. Clune:

We are transmitting to you one (1) copy of the revised RCRA Part B Application for the Pratt & Whitney facility located at 400 Main Street, East Hartford, Connecticut. A copy of the application was mailed to John Podgurski, USEPA on September 5, 1991, under separate cover. Also included with the Part B Permit Application is a copy of the Notice of Deficiency comments issued by your office on July 19, 1991, which are then followed by Pratt & Whitney responses in bold type. This document is the "roadmap" for the overall permit application per your request.

Pratt & Whitney would like to take this opportunity to discuss several programs currently underway, which will have an impact on some of the sections of this application. The sections which will be affected are the Training and the Contingency Plan sections. These are discussed below. The content of this discussion is to limit, if possible, the extent of permit modifications which may be required. In turn, this would give Pratt & Whitney and the CTDEP the needed opportunity to develop a closer professional relationship, which would be beneficial to both organizations.

Training

We are currently revising our hazardous waste training program. It is not possible to submit our revised program at this time, since the project is going through revisions. The September 5, 1991 revision describes our existing training program which meets the requirements of RCRA. The revisions to be developed will be integrated into the existing training program, hopefully without the need for a permit modification. We will transmit any revisions to the Part B Application as soon as it becomes available. The program is described in detail within the text of the permit application.

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Contingency Plan

Our contingency plan is currently being updated to include incident response and evacuation procedures. The contingency plan included in the Part B Application is the existing plan being utilized, and we anticipate that the upgraded plan will be completed by December 31, 1991, with the subsequent incorporation of this document into the permit application. Although the existing document meets regulatory requirements, the new plan will be much more comprehensive in scope and will extend beyond the requisite of regulatory requirements.

Pratt & Whitney would also like to comment on two other concerns in relationship with this application. These concerns are Hazard Ratings and the certification of NFPA requirements for storage of ignitable waste. These concerns are described in detail below:

Hazard Ratings

In reviewing our hazard ratings for various chemicals, we find the need for continued review of our assigned hazard ratings for health, reactivity and flammability. The reason for revision is that the original assignment of hazard ratings was based on one hundred percent of concentration, which is not the case. For example, the ratings assigned for nitric acid solution were in the four (4) range. The actual percentage of nitric acid in solution is in the range of fifteen to thirty percent, which would result in the assignment of lower hazard ratings. Once our review of the ratings is completed, we will transmit any revisions to the Part B Application as soon as it becomes available, hopefully without the need for a permit modification.

NFPA Certification

In response to your question No. five (5) in Section E; "Additional Requirements for Ignitable, Reactivity or Incompatible Waste"; we have retained the services of Foehl Sherman Inc. of Burlington, MA to perform the NFPA certification required by Question No. 5 for the storage of ignitable waste. We expect the certification required for the Concentrated Waste Storage and Transfer Facility (CWS&TF) to be completed by October 18, 1991. Once completed, such certification will be transmitted to your office for incorporation into the permit application.

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The last issue we would like to mention is the Interim Status of existing facilities. Our current application requests the permitting of the Concentrated Waste Storage and Transfer Facility (CWS&TF) only, with the deletion of Concentrated Waste Treatment Plant (CWTP5 and CWTP6) from the permitting process. Concentrated Waste Treatment Plant (CWTP5 and CWTP6) will now be utilized for less than ninety (90) day storage of onsite waste. This change is reflected in the current Part B Permit Application. On July 22, 1991, Bryan Kielbania of my staff had a phone conversation with George Dews from the CTDEP concerning interim status issues. As a result of that conversation, it is Pratt & Whitney's understanding that existing facilities which we are not requesting to be permitted, will retain interim status until such time that the proposed Concentrated Waste Storage and Transfer Facility (CWS&TF) becomes fully operational and permitted. At such time, those existing facilities would lose interim status.

Thank you for your cooperation and assistance. If you have any questions concerning this response, please contact Bryan Kielbania at 565-0903.

Sincerely,



R.C. Weiss
Director, Facilities & Services

RCW/BFK/dag

cc: John Podgurski, USEPA
George Dews, CTDEP
David Nash, CTDEP

bry-blh

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

3023743785

1189N

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Date

9-5-91

RECIPIENT'S COPY

From (Your Name) Please Print Jeffrey Loureiro		Your Phone Number (Very Important) 203-747-6191		To (Recipient's Name) Please Print John Podgurski Mail Code Hee-CAN6		Recipient's Phone Number (Very Important)	
Company LOUREIRO ENGINEERING ASSOC		Department/Floor No.		Company U.S. Environmental Protection Agency Re. I		Department/Floor No.	
Street Address 100 NORTHWEST DR				Exact Street Address (We Cannot Deliver to R.O. Boxes or P.O. Zip Codes.) JFK Federal Building			
City PLAINVILLE CT		State CT		City Boston		State MA	
ZIP Required 06062				ZIP Required 02203			

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5 ☐ Cash/Check

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** Declared Value Limit \$100.
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1 ☐ **HOLD FOR PICK-UP** (Fill in Box N)

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4 ☐ **DANGEROUS GOODS** (Extra charge)

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6 ☐ **DRY ICE** Lbs.

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8 ☐

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10 ☐

11 ☐ **DESCRIPTION**

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QUANTITY	WEIGHT in Pounds per
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Total	30

DIM SHIPMENT (Chargeable Weight)

☐ L x W x H = lbs.

1 ☐ Regular Stop 3 ☐ Drop Box

2 ☐ Call Stop 4 ☐ B.S.C.

5 ☐ Station

Emp. No. Date

☐ Cash Received

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